

AVA E-Recycling Closure Plan

Closure plan:

AVA E-Recycling has developed the following written plan for the proper closure of the facility; a closure plan based upon the following closure requirements:

(A) A description of how final closure of the facility will be conducted;

AVA E-Recycling coordinates with its insurance provider, landlord and other third party consultants including but not limited to local safety authorities, a plan to provide for the closure of the facility either planned or due to an emergency, identifying specific QEH&S staff that will have specific individual roles with respect to safety, materials management, cost assessments and downstream determined vendors for specific materials and commodities.

(B) An estimate of the maximum inventory of electronic devices ever on-site over the active life of the facility and a detailed description of the methods to be used during closure, including, but not limited to methods for removing, transporting, treating, storing or disposing of all electronic devices;

Maximum Inventory Estimate: (PENDING)

Upon determination of closure the triage staff noted in (A) will immediately begin an inspection of the facility to identify the focus materials of highest risk to environment health & safety and inventory these materials. The triage team will then begin the process to identify and communicate with specific downstream vendors and solid waste haulers (as necessary) whom have partnered with AVA in the past to recover the inventory of materials for final processing and decide on proper transport. If AVA has the capacity to utilize a site for proper storage it will determine the feasibility of that option.

(C) A detailed description of the steps needed to remove or decontaminate all harmful residues and contaminated containment system components, equipment, structures, and soils during closure.

The same aforementioned triage team will conduct walk throughs of the facility to determine if surfaces have been contaminated by spills, leakage, dusts, other residues or emissions, in any way and what clean up operations are appropriate and will provide the necessary equipments and supplies and designate appropriate staff to commence the cleanup.

(D)Amendment of closure plan. The recycler may amend the closure plan at any time prior to the notification of partial or final closure of the facility based on:

(A) Changes in operating plans or facility design affect the closure plan; **(NOT APPLICABLE)**

(B) In conducting closure activities, (unexpected events require a modification of the closure plan).

Cost-estimate for closure.

(A) The estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan;

(TO BE DETERMINED)

(B) The closure cost estimate must be based on the costs to the owner or operator of hiring a third party to close the facility. A third party is a party who is neither a parent nor a subsidiary of the owner or operator;

(NOT APPLICABLE)

(C) The closure cost estimate may not incorporate any salvage value that may be realized with the sale of electronic devices, facility structures or equipment, land, or other assets associated with the facility at the time of closure;

(D) The owner or operator may not incorporate a zero cost as electronic devices might have an economic value.

(Financial Assurance Coverage for Closure is Pending a Study Requested to AVA's Insurance Provider)

Revised 11_16_15 QEHS:rmc